

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSLYVANIA**

In re : **Chapter 13**
CHERYL LYNN LUTTS, :
Debtor : **No. 13-19684**

**DEBTOR'S RESPONSE TO BAYVIEW LOAN SERVICING, LLC'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY**

Respondent, the Debtor, Cheryl Lynn Lutts, by her undersigned counsel, hereby responds to Movant, Bayview Loan Servicing, LLC's Motion for Relief from the Automatic Stay, and in support thereof avers:

1. The original mortgagor was Carl Lutts, Sr., the late father of the Debtor.
2. The mortgagee, and Movant, is Bayview Loan Servicing, LLC.
3. Debtor assumed the mortgage as the heir of the original Mortgagee, Carl Lutts, Sr. upon his death.
4. Beginning in January 2015, through the present, Debtor has made payment to M&T Bank.
5. None of the payments that Debtor made to Movant were ever returned or otherwise not honored by Movant.
6. Thus, Debtor has not caused irreparable harm to the Movant.
7. On the contrary, Debtor has conscientiously, continuously and regularly taken steps to protect Movant's interests in the subject property.

WHEREFORE, Debtor respectfully requests that this Honorable Court DISMISS Bayview Loan Servicing, LLC's Motion for Relief from the Automatic Stay.

DATE: March 14, 2017

/s/ Isaac F. Slepner
ISAAC F. SLEPNER, ESQUIRE

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